SEALED

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7   **UNITED STATES DISTRICT COURT**
             DISTRICT OF NEVADA
8

9 UNITED STATES OF AMERICA,   Case No. 2:22-mj-00136-DJA

10   PLAINTIFF,   APPLICATION TO SEAL
   V.
11   (UNDER SEAL)
   TORI MANGUM,
12
                     DEFENDANT.
13

14   The United States of America, by and through CHRISTOPHER CHIOU, Acting

15 United States Attorney, and Supriya Prasad, Assistant United States Attorney, respectfully

16 move this Honorable Court for an Order sealing the Complaint, Probable Cause Affidavit,

17 Arrest Warrant, AO257, this Application, and the Court's Sealing Order, in the above-

18 captioned matter, until such time as this Honorable Court, or another Court of competent

19 jurisdiction, shall order otherwise.

20   Pursuant to LR IA 10-5, the Government requests that the accompanying Complaint in

21 this case be filed under seal. *See generally*, Fed. R. Crim. P. 6(e)(4) (permitting for the sealing of

22 an indictment); *State of Arizona v. Maypenny*, 672 F.2d 761, 765 (9th Cir. 1982) (supporting the

23 sealing of a search warrant when there is reasonable cause to believe that providing immediate

24 notification may have adverse results); *Matter of Sealed Affidavit(s) to Search Warrants*, 600 F.2d

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1   1256 (9th Cir. 1979) (same); *In re Braughton*, 520 F.2d 765, 766 (9th Cir. 1975) (same). In this

2   case, such an order would be appropriate because the Complaint and Affidavit relate to an

3   ongoing criminal investigation into violation(s) of Title 18, United States Code, Section

4   1073(1), that is neither public nor known to all of the targets of the investigation and its

5   disclosure may alert the targets to the ongoing investigation and pending arrest warrant. Public

6   disclosure of the information in the Complaint might possibly jeopardize the investigation

7   because Defendant is believed to be in contact with additional potential witnesses and/or

8   victims. Although Defendant is generally aware of the investigation and has spoken with

9   investigators, she is unaware federal charges are being sought against her. If she were to learn of

10   the charges via an unsealed Complaint, she may direct the destruction of potential evidence or

11   notify confederates, or both. Accordingly, there is reason to believe that disclosure of the

12   information will jeopardize the investigation, including by giving targets an opportunity to

13   destroy or tamper with evidence, change patterns of behavior, or notify confederates.

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15   DATED this __18th__ day of February 2022.

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17   Respectfully submitted,

18   CHRISTOPHER CHIOU
                                                United States Attorney

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21   SUPRIYA PRASAD
          Assistant United States Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,	Case No. 2:22-mj-00136-DJA
4 PLAINTIFF, V.	ORDER TO SEAL
5 TORI MANGUM,	(UNDER SEAL)
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8   Based on the pending Application of the Government, and good cause appearing

9   therefore, **IT IS HEREBY ORDERED** that the Complaint, the Probable Cause Affidavit,

10   Arrest Warrant, AO257, the Government's Application, and this Court's Sealing Order, in the

11   above-captioned matter shall be sealed until further Order of the Court.

12   IT IS FURTHER ORDERED THAT the Clerk's Office for the United States District

13   Court for the District of Nevada must release the sealed complaint to the CJA Panel Resource

14   Attorney, who may use the information in the sealed complaint for the sole purpose of securing

15   defense counsel in a timely manner.

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17   DATED this __18th__ day of February 2022.

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                                              UNITED STATES MAGISTRATE JUDGE

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